

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Prodea Systems, Inc.

Form 499 Filer ID: 826527

Name of signatory: Anousheh Ansari

Title of signatory: Chief Executive Officer

I, Anousheh Ansari, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Furthermore, I certify that: (a) the company did not provide telecommunication services to the public, within the meaning of the Communications Act of 1934, as amended, during calendar year 2008, but, in anticipation of providing telecommunication services in the future, has developed and implemented policies and procedures to comply with the Commission's CPNI rules; and (b) I have personal knowledge that my company's personnel are trained on these operating procedures for the purpose of ensuring compliance with the Commission's CPNI rules as the company comes into the possession of CPNI.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____



**Accompanying Statement to Annual Certification of CPNI
Prodea Systems, Inc.
February 27, 2009**

I, Anousheh Ansari, as the Chief Executive Officer of Prodea Systems, Inc. ("Prodea"), certify the Company has taken the following actions to ensure compliance with 47 C.F.R. § 64.2009(e):

Training and Discipline

- Prodea has trained all personnel as to the identification of CPNI and when CPNI may be used. Prodea trains all personnel on an annual basis.
- Prodea has an express disciplinary process in place for any unauthorized use of CPNI.

Operating Procedures

- During calendar year 2008, Prodea did not provide telecommunication services to the public, as defined in the Communications Act of 1934, as amended.
- During calendar year 2008, Prodea was not in possession of CPNI, and, therefore, did not use CPNI.
- In anticipation of providing telecommunications services in the future, Prodea's policies prohibit use of CPNI except as permitted under the exceptions set forth in 47 U.S.C. 222(d).
- In anticipation of providing telecommunications services in the future, Prodea has established procedures that limit access to CPNI to authorized personnel, who perform business functions needed to operate, support, and maintain services for a Customer.
- In anticipation of providing telecommunications services in the future, Prodea has implemented physical and electronic safeguards such as encryption to protect CPNI from unauthorized attempts to access CPNI.

Marketing Campaigns and Supervisory Review Process

- Prodea does not conduct outbound sales or marketing campaigns that utilize CPNI.

Third-Party Contractors

- Prodea policies and procedures require third-party contractors that handle CPNI to comply with CPNI regulations. As third-party contractors are utilized, Prodea's policies require annual audits of their compliance with Prodea's policies.

Notice of Unauthorized Disclosure of CPNI

- Prodea has established security response protocol under which the U.S. Secret Service and Federal Bureau of Investigation are notified of any unauthorized access to a consumer's CPNI.
- Prodea maintains all records, notifications and responses of any discovered CPNI breaches for at least 2 yrs.